

DAVID N. BARRY, ESQ. (SBN 219230)
ANNA H. GALAVIZ, ESQ. (SBN 293651)
THE BARRY LAW FIRM
11845 W. Olympic Blvd., Suite 1270
Los Angeles, CA 90064
Telephone: 310.684.5859
Facsimile: 310.862.4539

Attorneys for Plaintiff, GILBERTO PEREZ

H. PAUL EFSTRATIS, ESQ. (SBN 242373)
LEWIS BRISBOIS BISGAARD & SMITH LLP
45 Fremont Street, Suite 3000
San Francisco, California 94105
Telephone: (415) 362-2580
Facsimile: (415) 434-0882

Attorney for Defendant, FORD MOTOR COMPANY

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA**

GILBERTO PEREZ, an individual,

Plaintiff,

v.

FORD MOTOR COMPANY, A Delaware
Corporation; and DOES 1 through 20, inclusive,
Defendants.

Case No. 2:22-cv-01380-DJC-DB

(Removed from Sacramento County – Case
No. 34-2022-00322216)

**JOINT STIPULATION AND ORDER FOR
DISMISSAL WITH PREJUDICE**

**Action Filed: June 21, 2022
Trial Date: None**

District Judge: Hon. Daniel J. Calabretta

Plaintiff, Gilberto Perez, and Defendant, Ford Motor Company, by and through their
respective counsel of record, hereby submit this Joint Stipulation to Dismiss with Prejudice as
follows:

1 1. WHEREAS the parties agree that the matters in dispute between Plaintiff and
2 Defendant have been resolved.

3 **THEREFORE, IT IS HEREBY STIPULATED** by and between Plaintiff and Defendant,
4 by and through their attorneys of record, that the above entitled matter be dismissed in its entirety
5 with prejudice pursuant to Federal Rule of Civil Procedure 41(a)(1)(A)(ii) in accordance with the
6 terms of the parties' written settlement agreement.

7
8 Date: May 17, 2023

THE BARRY LAW FIRM

9
10 By: /s/ Anna H. Galaviz
11 David N. Barry, Esq.
12 Anna H. Galaviz, Esq.
13 Attorneys for Plaintiff,
GILBERTO PEREZ

14 Date: May 17, 2023

LEWIS BRISBOIS BISGAARD & SMITH LLP

15
16 By: /s/ H. Paul Efstratis (as authorized on May 17, 2023)
17 H. Paul Efstratis
18 Attorney for Defendant,
19 FORD MOTOR COMPANY

20 **IT IS SO ORDERED.**

21
22 Date: May 17, 2023

/s/ Daniel J. Calabretta
23 THE HONORABLE DANIEL J. CALABRETTA
24 UNITED STATES DISTRICT JUDGE
25
26
27
28